

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF WEST VIRGINIA
3 AT CHARLESTON

4 IN RE: ETHICON, INC., PELVIC)
REPAIR SYSTEM PRODUCTS)
5 LIABILITY LITIGATION)

6 THIS DOCUMENT RELATES TO THE) Master File No.
FOLLOWING CASES IN WAVE 1 OF) 2:12-MD-02327
MDL 200:) MDL 2327

7)
Marty Babcock v. Ethicon, Inc.) JOSEPH R. GOODWIN
8 Civil Action No. 2:12-cv-01052) U.S. DISTRICT
JUDGE

9 [Complete caption below])
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14 DEPOSITION OF
15 SCOTT GUELCHER
16 Taken on behalf of the Defendants
17 March 23, 2016
18 8:51 a.m.
19

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21
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	SOUTHERN DISTRICT OF WEST VIRGINIA	
2	AT CHARLESTON	
3	IN RE: ETHICON, INC., PELVIC)
	REPAIR SYSTEM PRODUCTS)
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	Marty Babcock v. Ethicon, Inc.) JOSEPH R. GOODWIN
8	Civil Action No. 2:12-cv-01052) U.S. DISTRICT
) JUDGE
9	Daphne Barker, et al. v.)
	Ethicon, Inc., et al.)
10	Civil Action No. 2:12-cv-00899)
)
11	Dorothy Baugher v. Ethicon,)
	Inc., et al.)
12	Civil Action No. 2:12-cv-01053)
)
13	Harriet Beach v. Ethicon,)
	Inc., et al.)
14	Civil Action No. 2:12-cv-00476)
)
15	Myra Byrd, et al. v. Ethicon,)
	Inc., et al.)
16	Civil Action No. 2:12-cv-00748)
)
17	Fran Denise Collins v.)
	Ethicon, Inc., et al.)
18	Civil Action No. 2:12-cv-00931)
)
19	Dennis W. Dixon, Estate of)
	Virginia M. Dixon,)
20	Deceased v. Ethicon, Inc., et al.))
	Civil Action No. 2:12-cv-01081)
21)
	Lois Durham, et al. v.)
22	Ethicon, Inc., et al.)
	Civil Action No. 2:12-cv-00760)
23)
	Karen Forester, et al. v.)
24	Ethicon, Inc., et al.)

1 A. I'm really trying to answer it. I
2 mean, it's a chemical reaction. It -- it -- it --
3 PROLENE is polypropylene with antioxidants. And
4 the antioxidants can delay the reaction, but,
5 eventually, it's going to happen. So. . .

6 Q. At what rate -- excuse me.

7 A. Go ahead. I -- I'm finished.

8 Q. At what rate does PROLENE undergo
9 autoxidation in the body?

10 A. I don't know the rate. I've not
11 measured it. But I wasn't really -- no. I don't
12 know the rate that -- that thermal oxidation is
13 going to. . .

14 Q. If we -- if we look at the summary of
15 opinions, Number 3 --

16 A. Okay.

17 Q. -- you discuss the dynamic environment
18 where polypropylene mesh is implanted. Do you see
19 that opinion?

20 A. Yes.

21 Q. What scientific evidence do you have,
22 Dr. Guelcher, for chain scission having occurred
23 with PROLENE in vivo?

24 MR. BOWMAN: Object to form.

1 MR. BOWMAN: Object to form.

2 THE WITNESS: I'd have to refresh
3 myself with the documents. I -- I -- I can't
4 remember them.

5 BY MR. HUTCHINSON:

6 Q. And as a material scientist, you'll
7 agree that PROLENE has a different chemical
8 composition than pure polypropylene, correct?

9 A. So PROLENE has two antioxidants, one
10 designed to prevent oxidation during
11 high-temperature processing, another during
12 storage. There are flow additives designed to make
13 extrusion easier, calcium stearate, some
14 surfactants. So there's other additives in there,
15 but those additives are added mainly for
16 manufacturing, in my understanding.

17 Q. Right. But PROLENE has a chemical
18 different composition -- strike that.

19 PROLENE has a different chemical
20 composition than pure PROLENE, correct?

21 MR. BOWMAN: Object to form.

22 BY MR. HUTCHINSON:

23 Q. I'm sorry. PROLENE has a different
24 chemical composition than pure polypropylene,

1 Can you tell us the name of a patient,
2 who received any one of the nine products, who had
3 their mesh specifically removed because of
4 oxidation?

5 A. Why would you remove a mesh for
6 oxidation? You remove it for another complication.
7 I mean, it's not -- oxidation leads to
8 embrittlement and degradation. So -- I mean,
9 they're -- they're removed because they become
10 embrittled. They extrude. They cause pain. Not
11 because -- I mean, there's not -- you wouldn't --
12 I'm confused. I'm sorry. Go ahead.

13 MR. HUTCHINSON: Move to strike as
14 nonresponsive.

15 BY MR. HUTCHINSON:

16 Q. Doctor, I'm asking for a name of
17 somebody who received any one of these nine
18 products who had their mesh specifically removed
19 because of oxidation. Can you tell us a name? Yes
20 or no? And then I'll move on.

21 A. This is a strange question. You
22 wouldn't remove a mesh for oxidation. It's a very
23 early event. I mean, I don't know that any of
24 these patients had it removed for oxidation. Like

1 resulting in a scar plate. I should be more
2 precise.

3 There's the macrophages and other
4 inflammatory cells, foreign body giant cells, that
5 migrate into the mesh, adhere to the mesh, secrete
6 reactive oxygen species, including hydroxyl
7 radicles, that oxidize the polypropylene. That --
8 that -- that's in my report. That's the -- that's
9 the tissue response. The primary components are
10 the fibroblasts and -- and with the collagen matrix
11 deposition and the -- and the macrophages.

12 BY MR. HUTCHINSON:

13 Q. Doctor, can you tell us from a
14 physiological standpoint how oxidation causes pain
15 in a woman?

16 A. Again, it's in my report. Oxidation
17 leads to reduction of molecular weight,
18 embrittlement, and that can lead to cracking, which
19 can lead to erosions and pain. It's hard plastic
20 in the pelvic floor. That's going to cause pain.

21 Q. And oxidation also leads to reduction
22 in physical properties, correct?

23 MR. BOWMAN: Objection to form.

24 THE WITNESS: What -- physical